

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

THE STATE OF TEXAS et al.

Plaintiffs,

VS.

GOOGLE LLC,

Defendant.

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Civil Action No. _____

JURY TRIAL DEMANDED

MOTION FOR LEAVE TO FILE UNREDACTED COMPLAINT UNDER SEAL

Plaintiff State of Texas, on behalf of the Plaintiff States, respectfully files this Motion for Leave to File Unredacted Complaint Under Seal.

Plaintiffs' Unredacted Complaint contains information that was received by Plaintiffs in response to Civil Investigative Demands which were separately issued to Defendant and third-parties pursuant to Section 15.10 of Texas Free Enterprise and Antitrust Act of 1983, TEX. BUS. & COM. CODE. 15.01 et seq. ("Texas Antitrust Act"), and which the producing parties have designated as warranting confidentiality protections. The Texas Antitrust Act requires this information to remain confidential except under limited circumstances. Therefore, Plaintiffs request that the confidentiality of this information be maintained under seal until such time as the Court orders its release, necessary notice is given to the producing parties, or the producing parties consent to its release.

The sealed complaint is ready to be filed upon entry of an order granting the relief sought through this motion.

A proposed order is attached.

December 16, 2020

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** Applications for pro hac vice forthcoming*

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